

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JAMIE L. DAUGHERTY	:	
Debtor	:	CASE NO. 1-19-04047-HWV
	:	
M&T BANK	:	Motion for Relief From Stay
Movant	:	
v.	:	
	:	
JAMIE L. DAUGHERTY	:	
CHARLES J. DEHART, CH. 13	:	
TRUSTEE,	:	
Respondents	:	

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY M&T BANK**

Comes Now, Debtor, Jamie L. Daugherty by and through her counsel, Lisa A. Rynard, Esquire, and Answers the Motion for Relief from the Automatic Stay filed by M&T Bank, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Neither admitted, nor denied. Debtor is without sufficient knowledge to form a belief as to the truth of paragraph 5.
6. Admitted.
7. Admitted.
8. Denied. It is denied that Movant is entitled to relief from the automatic stay for cause. Debtor would like to resolve any post-petition arrears through mutually acceptable Stipulation terms. Strict proof otherwise is demanded at hearing.

9. Denied. Movant is without cause and strict proof is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;
- c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and
- d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Purcell, Krug & Haller

By: /s/ Lisa A. Rynard

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Dated: March 27, 2020